

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

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In Re:  
Angela R. Thomas

Case No.: 20-22347 (JNP)  
Judge: Jerrold N. Polsuny  
Chapter: 13

### CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION

The debtor in this case opposes the following **(choose one)**:

1. ☒ Motion for Relief from the Automatic Stay filed by US Bank Cust for Pro Cap 8 ,  
creditor,

A hearing has been scheduled for April 6, 2021 , at 11:00 am .

- ☐ Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for \_\_\_\_\_ , at \_\_\_\_\_ .

- ☐ Certification of Default filed by \_\_\_\_\_ ,

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons **(choose one)**:

- ☐ Payments have been made in the amount of \$ \_\_\_\_\_ , but have not  
been accounted for. Documentation in support is attached.

☐ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

☒ Other (**explain your answer**):

Debtor asserts that her property taxes are paid through her mortgage; She has no knowledge of Tax Lien; Creditor has not filed a POC for review; Creditor has not filed an Objection to the Chapter 13 Plan. Where appropriate Objection or POC is filed Debtor will review and determine if an Amended Plan is necessary. A Motion for Relief is the inappropriate recourse for this potential issue.

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: March 22, 2021

/s/ Angela R. Thomas  
Debtor's Signature

Date: \_\_\_\_\_

\_\_\_\_\_  
Debtor's Signature

**NOTES:**

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.